

# TECHNIC SERVICES

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Re: DOCKET NUMBER PHMSA - 06 - 25885

Page 1 of 2

The blanket inclusion of any quantity of the following types of Division 1.4 explosives (listed by proper shipping name and Un identification number) will adversely affect my business. And, may force me out of business. I will not be able to acquire the products used to produce special effects in the “movies”, “TV”, and “live performance” (Opera, Concerts, Drama, Musical, business meetings, etc.)

Special Effects create illusion. That huge explosion that you see is a matter of scale. Most of the work I have done involves scale models. Yet when you see the building disappear in the film it seems to be ten stories tall. The “Back to Future III” steam engine going over the cliff was a 1/5th scale model and the blimp in the “Rocketeer” was a 1/10th scale model.

When a person is shot, special effects create the illusion of an entry wound, exit wound, and the damage to surround objects. When gunfire occurs, special effects create the illusion of damage to objects. Either the location that is used is private property, for example, a local bar, that when the filming is over, can not have been damaged. Or, the movie owns the set and it is constructed with the intent of being destroyed on camera.

I have just described what is commonly thought of as Special Effects. However, Special Effects includes; wind, rain, snow, working [sinks, showers, stoves], dust, cobwebs, sinking ship, raging rivers, and more.

In creating Special Effects on stage, for example, “The Wizard of Oz”, “Damn Yankees”, “Into the Woods” fire bursts from fingertips, smoke obscures action, comets fly, waterfalls of sparks form a backdrop, require 1.4 materials to create. Very small quantities. Remember the performer is working in close proximity to the effects.

NOTE; Presently, because most shipments of Division 1.4 explosives used by Special Effects Technicians contain “small” quantities of product, they are not required to be placarded. And, do not require security plans

The Special Effects industry does not use (2) Detonators for ammunition (UN 0365, UN 0366). Any amount of this product being placed on the requirement for a security plan list will not effect my business.

## TECHNIC SERVICES

Re: DOCKET NUMBER PHMSA - 06 - 25885

Page 1 of 2

However, the Special Effects industry does use;

- (1) Detonator assemblies, non electric for blasting (UN 0361, UN 0500)
- (3) Detonators, electric, for blasting (UN 0255, UN 0456)
- (4) Detonators, non-electric, for blasting (UN 0267, UN 0455)
- (5) Cord, detonating, mild effect (UN 0289)
- (6) Cord, detonating, mild effect, metal clad (UN 104)
- (7) Charges, shaped, flexible, linear (UN 0237)
- (8) Charges, shaped, without detonator (UN 0440, UN 04410)

The products used by Special Effects industry, are produced by small companies that are properly licensed by Federal and State Governments.

If the commercial carriers that presently carry Special Effect products (1.4) are required to have a security plan and incur the cost of implementing such a security plan, they will refuse to carry that product. The volume of business does not warrant the cost. Or, the Tarriffs would be so high as to preclude using any shipper

I propose that security plan proposal for Division 1.4 explosives ([Section] 2, Division 1.4 Explosives), beginning in the middle of the second (2<sup>nd</sup>) paragraph, after this sentence;

**“Therefore, in ths NPRM, PHMSA proposes to require a security only for shipment of any quantity of the following types of Division 1.4 explosives (listed by proper shipping name and UN identification number) because they are difficult to produce, are key components to IEDs, and can be used as initiators for other explosives;”**

be changed to read:

***(1) Detonators for ammunition (UN 0365, UN 0366)***

***Quantities of the following types of Division 1.4 explosives (listed by proper shipping name and UN identification number) less than two hundred fifty (250) devices shall not require a security plan;***

***(1) Detonator assemblies, non electric for blasting (UN 0361, UN 0500)***

***(2) Detonators, electric, for blasting (UN 0255, UN 0456)***

***(3) Detonators, non-electric, for blasting (UN 0267, UN0455)***

***Quantities of the following types of Division 1.4 explosives (listed by proper shipping name and UN identification number) less than ten pounds (10lb) devices shall not require a security plan;***

***(4) Cord, detonating, flexible (UN0289)***

***(5) Cord, detonating, mild effect (UN 0289)***

***(6) Cord, detonating, mild effect, metal clad (UN 104)***

***(7) Charges, shaped, flexible, linear (UN 0237)***

***(8) Charges, shaped, without detonator (UN 0440, UN 04410)***

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Owner  
Technic Services